

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

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DISTRICT OF MARYLAND
BY _____ Deputy

IN THE MATTER OF:

**CRIMINAL COMPLAINT AND ARREST
WARRANT FOR VERENA MAY MATHIS**

FILED UNDER SEAL

CASE NO. 1:24-mj-00400

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR COMPLAINT
AND ARREST WARRANT**

I, Rachal M. Torg, a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (HSI), being duly sworn, depose and state as follows:

1. I have been employed as an HSI Special Agent since November 2017. As part of the daily duties as an HSI Special Agent, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography, in violation of Title 18, U.S.C. §§ 2251, 2252 and 2252A. I have gained experience through training in seminars, classes, and daily work related to conducting these types of investigations. Specifically, I have received formal training through HSI and other agencies in the area of child pornography, pedophile behavior, collectors of other obscene material, and internet crime. I have participated in the execution of numerous search warrants, of which the majority has involved child exploitation and/or child pornography offenses. Many of the child exploitation and/or child pornography search warrants resulted in the seizure of computers, cell phones, magnetic storage media for computers, other electronic media, and other items evidencing violations of federal laws, including various sections of Title 18, United States Code § 2252A involving child exploitation offenses. In the course of my employment with HSI, I have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media and within online accounts.

2. As a federal agent, I am authorized to investigate violations of laws of the United States.

PURPOSE OF THIS AFFIDAVIT

3. I make this affidavit in support of application for a criminal complaint and arrest warrant charging **VERENA MAY MATHIS (“MATHIS”)** with 18 U.S.C. § 2251(a) (Sexual Exploitation of Children) and 18 U.S.C. § 2252A(a)(2) Distribution of Child Pornography

4. The statements in this Affidavit are based in part on information provided by other law enforcement officers and on my investigation of this matter. Since this Affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to arrest **MATHIS**.

INTRODUCTION

5. This ongoing investigation has yielded probable cause that **Verena May MATHIS** has produced sexually explicit videos of an infant child (Minor Victim or MV) in her care and has stored those visual depictions on electronic devices in violation of federal law. **MATHIS** also performed sex acts on the infant child. **MATHIS** enticed, provided, advertised, maintained, and solicited MV to engage in a commercial sex act.

6. Your Affiant is working a child exploitation investigation jointly with the Maryland State Police (“MSP”), Howard County Police Department (“HCPD”), and Baltimore Police Department (“BPD”). The ongoing investigation has yielded Eugene Edward **GOLDEN (“GOLDEN”)** possessed child pornography and solicited the production of child pornography.

7. The investigation has revealed **GOLDEN** possessed numerous files of child pornography depicting the sexual abuse of infants and toddlers. The investigation has also revealed **GOLDEN** solicited the production of a number of these child pornography files from

various third parties, who appear to have engaged in child sex abuse, including physical abuse of infants and toddlers, at the behest of GOLDEN and in exchange for financial compensation.

8. During an authorized search of GOLDEN's online Google accounts during the course of the investigation, media files of **MATHIS** with MV were discovered, as described in detail below.

PROBABLE CAUSE

9. In July 2022, the Maryland ICAC Task Force assigned NCMEC Cyber Tip #128887022 and eight related cyber-tipline reports ("Associated Cyber Tips") to the Baltimore Police Department for investigation.

10. NCMEC escalated the Associated Cyber Tips because Cyber Tip #128887022 stated that the referral, "...appears to contain images/videos that appear UNFAMILIAR and may depict NEWLY PRODUCED and/or HOMEMADE CONTENT". The Associated Cyber Tips indicate that on various dates from 2020-2022, the account user uploaded child pornography to the Google Drive infrastructure.

11. Pursuant to a state search warrant obtained by MSP, Google produced account content containing the Google Drive content for the reported Google account in the NCMEC Cyber Tip. The Google account reported in the Associated Cyber Tips was linked to GOLDEN.

12. Your Affiant reviewed the Google Drive contents and observed over 700 files of commercially available child pornography. Also observed were hundreds of homemade video and image files that depicted adult females sexually abusing children at the behest of GOLDEN. A review of the apparent homemade files reasonably estimates there are approximately fifteen (15) to twenty (20) unique children in the videos solicited by GOLDEN, with at least seven (7) to ten (10) adult females who are depicted in the homemade videos.

13. In a number of the homemade videos, the adult females are engaging in the physical and sexual abuse of the child victims. Many of the children appear to be infants or toddlers. In several of the homemade videos, the adult females make sexually charged remarks to “Eugene,” “Gene,” and “Prince”. Additionally, several of the children make remarks to “Mr. Prince” in some of the videos. Your Affiant notes that GOLDEN’s first name is “Eugene,” GOLDEN’s nickname is “Gene,” and GOLDEN’s self-reported moniker is “Prince.”

14. In several of the homemade videos, the adult females specifically tell GOLDEN that he needs to pay them in exchange for their sexual exploitation of their children.

15. On December 1, 2022, the federal grand jury returned an indictment against Eugene Edward GOLDEN (“GOLDEN”) on charges of 18 U.S.C. 2251(a) (Sexual Exploitation of a Child) and 18 U.S.C. 2252A(a)(5)(B) (Possession of Child Pornography). *See United States v. Eugene Edward Golden, GLR-22-414*. A second superseding indictment was filed on June 1, 2023 against GOLDEN and several female co-defendants on charges of 18 U.S.C. § 2251(a) (Sexual Exploitation of a Child), 18 U.S.C. 2252A(a)(2) (Receipt/Distribution of Child Pornography; and 18 U.S.C. § 1591(a), (b)(1) (Sex Trafficking of Children) (GLR-22-414). The female co-defendants (Edna LOPEZ, Crystal WRIGHT, April DUNBAR, Quanita HINES, Marianne MILLER, and Ocean MAHONE) either gave statements or other evidence was discovered that each female was engaged in commercial sex work at the time they encountered GOLDEN through commercial sex websites. GOLDEN sought out minor victims through their mothers or other female family members who were engaged in commercial sex work.

IDENTIFICATION OF VERENA MAY MATHIS
AND EVIDENCE OF PRODUCTION OF CHILD PORNOGRAPHY

16. As discussed previously in this affidavit, Your Affiant observed several hundred files of apparent homemade files of child pornography involving the sexual abuse of infants and

toddlers by adult women in the online accounts of GOLDEN. Your Affiant specifically observed a series of at least 3 files, which contained an adult female later identified as **MATHIS**, sexually abusing a pre-pubescent minor child. Some videos provided details that allowed other videos to be associated to **MATHIS** (i.e. clothing, objects, rooms, etc.). Your Affiant has reviewed these files, and has concluded, based on my training and experience, that the files contain visual depictions of a minor engaged in sexually explicit conduct and is child pornography under 18 U.S.C. § 2256 (8). Some of the files are described below:

a) **VID-1:** File Name: Google-CT-RPT-d405f2c760da9cba9c8eedc7aaf80316-5fcbc433bf7642.23103524.mp4_HD(1).mp4
Creation Date: 12/05/2020
Description: This is a color video, approximately one (1) minute and thirty seconds in length. The video depicts an infant child (MV) laying on her stomach on an apparent bed. **MATHIS** is spreading the buttocks of Minor Victim's with her hand, exposing Minor Victim's anus, while saying "[unintelligible], do you want me to fuck [unintelligible] butt ass hoe?". **MATHIS** then says "ok" and proceeds to lick the anus of Minor Victim. **MATHIS** then spreads the buttocks with her hand again, exposing Minor Victim's anus, and states, "Jay, do you want us to suck your dick?". Minor Victim rolls over onto her back, legs spread apart, with her genitals exposed. **MATHIS** then starts to say, "Do you want me to eat..." and then pauses. An apparent male voice is heard in the background whispering something to **MATHIS**. **MATHIS** then says, "Do you want to eat these funky asses, Jay?" **MATHIS** then moves to the side of the bed and exposes her (**MATHIS**) anus and genitals to the camera. **MATHIS** then turns back to the bed and lifts Minor Victim's legs up, exposing the genitals and anus. A male voice in the background says, "Now suck your fingers". **MATHIS** then proceeds to suck her finger and says, "Jay, do you want to eat these funky asses?" **MATHIS** then rubs her finger on and around on the mouth of Minor Victim. **MATHIS** then asks, "How long have we been at this?"

b) **VID-2:** File Name: 5fbc176a1ee1.38259610.mp4_HD(1).mp4
Creation Date: 12-05-2020
Description: This is a color video, approximately fifty (50) seconds in length. The video depicts Minor Victim laying on her stomach on an apparent bed. There appears to be a

diaper near the head of Minor Victim. **MATHIS** spreads the buttocks of Minor Victim, exposing the anus. **MATHIS** then says, “Come on, the video...the video of me licking”, and then proceeds to lick the anus of Minor Victim. **MATHIS** then says, “Jay, do you want to fuck my butt?” **MATHIS** then whispers “ok” and sits Minor Victim up on the bed next to her and proceeds to lick her finger and rub her finger on Minor Victim’s lips. **MATHIS** then instructs the individual behind the camera by saying, “Now show her”. The camera moves to show Minor Victim as **MATHIS** rubs her finger on and about Minor Victim’s mouth and lips. An apparent male voice in the background says something unintelligible, and **MATHIS** then asks, “Do you want us to suck your dick?” **MATHIS** then moves away from Minor Victim and tells the individual behind the camera, “Now show...now show the baby.” The camera moves to show Minor Victim.

c) **IMAGE-1:** File Name: media_5fcbc5592769c2.24804725(1).png

Description: This is a color image, depicting **MATHIS** on her knees, bent over on a bed. **MATHIS** is naked with her anus and genitals exposed. To the right of **MATHIS** is Minor Victim, naked and laying on her stomach. **MATHIS** is using her hand to spread the buttocks of Minor Victim, exposing the anus and genitals.

17. Based on my review of the four videos described above, combined with the evidence described more fully below, I believe the adult female depicted in these files is **MATHIS** files reflect “creation dates” of on or about 12/05/2020.

18. During a review of the aforementioned video files, Your Affiant observed that the female depicted in the video had distinctive tattoos. Your Affiant has set forth two redacted screenshots of these tattoos below:



19. As part of this ongoing investigation, law enforcement conducted an exhaustive review of law enforcement databases, open-source data, and worked with several specialized child victim identification groups including the National Center for Missing and Exploited Children and were unable to identify this adult female offender.

20. On February 13, 2024, law enforcement released redacted photographs to the public with an offer of up to \$14,000 in reward money for information leading to the identification of the adult female depicted in the above-described videos. Your Affiant specifically notes that the photographs above were included in the media release, which targeted news outlets and social media in the DMV (DC, Maryland, Virginia).

21. A few hours after the release of the redacted photos to the public, law enforcement received a telephone call via the established tip-line from a female witness (“INDIVIDUAL-1”). INDIVIDUAL-1 identified herself to law enforcement and indicated that she was certain that the female depicted in the images is Verna **MATHIS**, a prior resident of Capital Heights, Maryland.

22. INDIVIDUAL-1 indicated that she was familiar with **MATHIS** because **MATHIS** previously resided with INDIVIDUAL-1. INDIVIDUAL-1 indicated that she knew that **MATHIS**

was depicted in the photographs because of her identifiable tattoos. INDIVIDUAL-1 indicated that **MATHIS** previously resided on Byers Street in Capital Heights, Maryland. INDIVIDUAL-1 indicated that **MATHIS** had a tattoo that reads “DUGO,” which is a moniker for her baby’s father, and that INDIVIDUAL-1 recognized this tattoo on the news release.


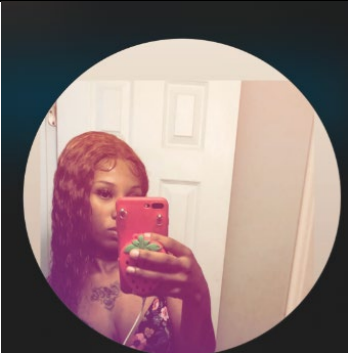

23. INDIVIDUAL-1 stated **MATHIS** uses an Instagram account identified as r.a.i.n.n_. INDIVIDUAL-1 also identified **MATHIS**’s baby father as Tyshawn Hill. INDIVIDUAL-1 indicated that she was providing information to law enforcement due to the financial reward. INDIVIDUAL-1 agreed to meet with investigators.

24. MSP researched **MATHIS** and learned that Verena May **MATHIS** (B/F DOB: 10/6/1999) has multiple arrests and a prior address on Byers Street in Capital Heights, Maryland. Your Affiant is further aware that **MATHIS** has police interaction documented on multiple occasions involving Tyshawn HILL, also consistent with the information provided by INDIVIDUAL-1.

25. Additionally, according to law enforcement records from January 2021, **MATHIS** was documented in a police report along with a one-year-old female that appears to be **MATHIS**’s daughter. Your Affiant and members of the investigative team reasonably believe that the aforementioned videos were captured in December 2020. Your Affiant is aware that the general age and sex of **MATHIS**’s daughter match the age/sex of Minor Victim depicted in the child pornography films described herein.

26. Law enforcement reviewed the public profile photograph associated with Instagram account r.a.i.n.n_, the Instagram account provided by INDIVIDUAL-1. As previously discussed, INDIVIDUAL-1 indicated that this Instagram account is controlled by **MATHIS**. Law enforcement observed immediately that the female depicted in the profile picture of this Instagram

account has a matching chest tattoo to the above-described child pornography files. A comparison is set forth below:

		
<p><i>Child Pornography File</i></p>	<p><i>Instagram Profile Photo for r.a.i.n.n</i></p>	<p><i>Instagram Profile Photo for r.a.i.n.n (zoomed/cropped)</i></p>

27. Law enforcement contacted a DC Metropolitan Police Department (DCMPD) Detective and requested body worn camera footage or photographs retained by the Metropolitan Police Department that capture with interactions with **MATHIS**. The DCMPD Detective was able to retrieve digital photographs depicting **MATHIS** that were captured during a domestic assault investigation in May 2022. Your Affiant again recognized that the chest tattoo on **MATHIS** matches the tattoo observed in the child pornography files described herein. A comparison is set forth below (right):

		
<p><i>Child Pornography File</i></p>	<p><i>MPD Photograph</i></p>	<p><i>MPD Photograph (zoomed/cropped)</i></p>

28. Law enforcement database queries revealed a Maryland driver's license for a **Verena May MATHIS**, with DOB October 6, 1999, and SSN ending in -5855. The Driver's License (M320843594770) expired on 10-02-2020 and has a listed address for **MATHIS** as 2225 Columbia Pl, Hyattsville, MD 20785. Below, Your Affiant has set forth the MPD photograph of **MATHIS** (left) and her Maryland MVA photograph (right) for comparison¹:






29. On the evening of February 13, 2024, an MSP Trooper and a HCPD detective interviewed INDIVIDUAL-1 in Prince George's County, Maryland. INDIVIDUAL-1 was accompanied by an additional adult, hereinafter referred to as INDIVIDUAL-2.

30. During the voluntary interview, which was audibly recorded, INDIVIDUAL-1 provided near-identical information to the statement that she provided via the tipline call. INDIVIDUAL-1 indicated that she was 100% certain that **MATHIS** was the subject depicted in the press release. INDIVIDUAL-1 indicated that **MATHIS** was staying periodically with her in

¹ Your Affiant notes the same neck tattoo is observed in both photographs.

2020 and was engaged in commercial sex work during this period of time². INDIVIDUAL-1 obtained INDIVIDUAL-2's smartphone, which was logged into the Instagram application and navigated to the Instagram profile associated with r.a.i.n.n_. Law enforcement observed numerous photographs depicting **MATHIS**³ and several minor children. In a number of the photographs posted to the account, law enforcement observed additional tattoos visible in the above-described child pornography files, including the wrist tattoo spelling "DUGO".

		
<i>Wrist tattoo from child pornography films</i>	<i>Instagram Post on r.a.i.n.n_ posted on 10/24/2019</i>	<i>Instagram Post on r.a.i.n.n_ posted on 10/24/2019 (cropped/zoomed)</i>

CONCLUSION

31. Based on the above information, I respectfully submit there is probable cause to believe that **Verena May MATHIS** has committed violations of 18 U.S.C. § 2251(a) (Sexual Exploitation of Children) and 18 U.S.C. § 2252A(a)(2) Distribution of Child Pornography from in or about 12/13/2020. Based on the activity of **MATHIS** detailed above, as well as my training and experience, I believe that the **MATHIS** produced child pornography and distributed child

² It is known to law enforcement and is part of the conspiracy in US v. Golden, GLR-22-414, that GOLDEN met his co-defendant females through commercial sex websites while those females were engaging in commercial sex work, leading to his solicitation of these females to produce sexually explicit images of children.

³ Your Affiant makes this assessment based on a comparison with booking photographs that depict **MATHIS**.

pornography. I respectfully request that this Court issue an arrest warrant and complaint for **MATHIS.**



Rachal M. Torg
Special Agent
Homeland Security Investigations

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) this 14th day of February 2024.



HONORABLE ERIN ASLAN
UNITED STATES MAGISTRATE JUDGE

